

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SONYA LARSON,
Plaintiff,

v.

DAWN DORLAND PERRY,
COHEN BUSINESS LAW GROUP, PC and
JEFFREY A. COHEN, ESQUIRE,
Defendants

AND

DAWN DORLAND PERRY

Plaintiff-in-Counterclaim

v.

SONYA LARSON

Defendant-in-Counterclaim

C.A. No. 1:19-CV-10203- IT

**ASSENTED-TO MOTION TO ENTER
STIPULATED PROTECTIVE ORDER**

Pursuant to Fed. R. Civ. P. 26(c)(1) and Local Rule 7.1, Plaintiff and Defendant-in-Counterclaim, Sonya Larson, Defendant and Plaintiff-in-Counterclaim, Dawn Dorland Perry, Defendants Cohen Business Law Group, PC and Jeffrey A. Cohen (together, the “Parties”), through their undersigned counsel, jointly move for the entry of the Stipulated Confidentiality Agreement and Protective Order Concerning Documents Produced by Third Party GrubStreet, attached hereto as Exhibit A.

In support of this joint motion, the parties state as follows:

1. Under Fed. R. Civ. P. 26(c)(1), the Court, upon a showing of good cause, may “issue an order to protect a party from annoyance, embarrassment, oppression, or undue burden or expense”

2. The proposed protective order is limited in scope, related only to documents produced by third-party GrubStreet, Inc., the current or former employer of one or more parties to this litigation.

3. Due to GrubStreet’s status as an employer of a party(ies), documents produced may contain information and documents protected from disclosure by statute or otherwise.

4. The entry of the Protective Order will enable the Parties to adequately protect such information, to allow for its production without Court intervention, to expedite the flow of discovery, and to facilitate the prompt resolution of disputes over confidentiality.

5. The attached Protective Order includes limitations on use of all documents produced by GrubStreet, and particular further limitations for documents deemed “CONFIDENTIAL”.

6. All Parties and third-party GrubStreet have agreed to the attached form, as indicated by their signatures on said Protective Order.

7. Plaintiff and Defendant-in-Counterclaim Sonya Larson and Defendants Jeffrey Cohen and the Cohen Business Law Group *assent to this motion*.

WHEREFORE, for the reasons stated above, Defendant Dawn Dorland Perry requests that this Court enter the attached proposed Stipulated Protective Order as an order of this Court.

Respectfully submitted,

DAWN DORLAND PERRY

By Her Attorneys,

PARTRIDGE SNOW & HAHN LLP

/s/ Suzanne M. Elovecky

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CERTIFICATION OF COMPLIANCE WITH LOCAL RULE 7.1

I hereby certify that I have complied with Local Rule 7.1 by conferring with counsel for Plaintiff and co-Defendants in this Action concerning the above motion. All counsel of record to this action assents to the motion.

/s/ Suzanne Elovecky

Suzanne Elovecky

April 30, 2021

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on April 30, 2021.

/s/ Suzanne Elovecky

Suzanne Elovecky

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